Message

From: Shea, Valois [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4217A71307D4429B7BDC7C80EB40C7D-SHEA, VALOIS]
Sent: 6/17/2017 5:39:42 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: Comments on Powertech Underground Injection Control Draft Area Permits, Dewey-Burdock Uranium In-Situ Recovery Site, Edgemont, SD

Ms Ex. 6 Personal Privacy (PP)
Thanks for sending me your comments and this example from your personal professional experience.

Valois

Valois Shea
U.S. EPA Region 8
MailCode: 8WP-SUI
1595 Wynkoop Street
Denver, CO 80202-1129
Phone: (303) 312-6276
Fax: (303) 312-6741
Email: shea.valois@epa.gov

From: Ex. 6 Personal Privacy (PP)
Sent: Saturday, June 17, 2017 11:20 AM
To: Shea, Valois <Shea.Valois@epa.gov>
Subject: Comments on Powertech Underground Injection Control Draft Area Permits, Dewey-Burdock Uranium In-Situ Recovery Site, Edgemont, SD

Dear Ms. Shea:

From 1992 through 1999, I was an environmental engineer and eventually the environmental compliance manager for the largest oil refinery in Minnesota, now known as Flint Hills Resources (formerly Koch Refining Company). When we took a large gasoline storage tank out of service for routine cleaning in September 1997, we found a nickel-sized hole in the bottom. Understanding immediately that we'd had a very large spill, we called the Minnesota Pollution Control Agency (MPCA), our regulating agency, and told them about the problem.

The MPCA came out, we drilled some exploratory wells, and found there was a large lake of product, hundreds of thousands of gallons, lying on the water table. After several meetings with regulators, we devised a plan that the MPCA agreed was the best: we'd drill more wells and pump the product off the water table, send it through the refining process again and, of course, replace the entire floor of the tank.

The following year, while we were still pumping that gasoline off the water table, the weather was very dry, and the water table dropped as a result. One afternoon when I was on call, an employee walking his dog on the shore of the Mississippi River on a Sunday afternoon called the refinery and told us his dog had come out of a swamp smelling like gasoline. The refinery called me, and I called the MPCA, and we immediately called a refinery emergency.

The gasoline lying on top of the water table had been fine until the water table dropped. Then, as it turned out, it had seeped down a fracture in the subterranean bedrock, a crack nobody had known was there, and emerged in a backwater slough of the river. The regulatory agency had brought its geologists and hydrologists to all the meetings, and they had investigated the area and concurred with our plan. Our own hydro-geologists did, too. Fortunately, the spill was caught before that gasoline made it to the river itself, but it cost the refinery millions of dollars to clean up, and the cost to that slough was that it essentially got eradicated in the cleanup. If that employee had chosen some other place to walk his dog, we might not have discovered the spill until it had reached the locks at Hastings, Minnesota, several miles downriver. By then the damage would have been much more significant.

Let me stress that the refinery did everything right, everything it was supposed to do, in dealing with the spill. But nobody knew – nobody COULD know – about that fracture in the bedrock.

And neither will Powertech. I'm sure they'll use the very best technology to try to protect our water, but because we can't see underground, we can't know with certainty how anything will behave in that environment. Is it worth it to risk Powertech's uranium-laden solution getting into our underground aquifers (not just the Inyan Kara)—where it will mix, not lie on top—and make that water unusable far into the future? We in western South Dakota cannot afford to pollute the very water we rely on, not only for agriculture and animal husbandry, but for life. I hope you agree with me that, no, it's not worth that risk.

I urge you to deny Powertech's permit for uranium mining in the southern Hills. Our water is simply too precious. Thank you.

Ex. 6 Personal Privacy (PP)